REMARKS

Claims 1-28 were pending when a Final Office Action mailed February 18, 2005, rejected Claims 2, 3, 16, and 17 under 35 U.S.C. § 112, Claims 1, 13-15, 27 and 28 under 35 U.S.C. § 102 and Claims 2-12 and 16-26 under 35 U.S.C. § 103. By way of this amendment, Applicant hereby amends Claims 1, 2, 15, and 16. Pursuant to 37 CFR § 1.116, Applicant hereby respectfully requests reconsideration of the application.

TELEPHONE INTERVIEW

On April 25, 2005, a telephone interview was held between Examiners Fernandes and Lee, M. Smith and G. Coen. The merits of amendments to Claims 1 and 2 were discussed.

REJECTION OF CLAIMS UNDER 35 U.S.C. § 112, FIRST PARAGRAPH

The Office Action rejected Claims 2, 3, 16 and 17 for not being enabled. The Office Action states that the specification does not reasonably provide enablement for a valid type dependency. Applicant hereby amends Claims 2 and 16.

Applicant submits that support for the amendment appears in FIGURE 4 and on page 5, lines 6-15. Thus, Applicant submits that the specification enables a person skilled in the art to make or use the invention commensurate in scope with the claims.

REJECTION OF CLAIMS UNDER 35 U.S.C. § 102

The Office Action rejected Claims 1-3, 13-17, 27 and 28 as being anticipated by Preston. The Office Action states that Preston discloses viewing a data dictionary structure comprising a data dictionary retrieval component that includes terms and term definitions, a second component for determining all lexical nodes based on the terms, a third component that parses each term's definition, a fourth component that determines dependencies of each node based on the parse definitions and the terms associated with other lexical nodes, and a fifth component that

BLACK LOWE & GRAHAM PLLC

701 Fifth Avenue, Suite 4800
Seattle, Washington 98104
206.381.3300 • F: 206.381.3301

generates a lexical graph based on the determined nodes and dependencies. With regarding amended independent claims, Applicant respectfully traverses this rejection.

Applicant submits that Preston is most likely retrieving a lexical database of the English language. Preston identifies semantically meaningful elements in inputted text (a sentence) which is different than the lexical database. Preston uses the lexical database in order to identify semantically meaningful elements in the inputted text and derive relationships between the identified semantically meaningful elements. Preston discloses a freeform source document as inputted and processed to locate semantically meaningful entities and to store corresponding content data and is not a method for viewing a data dictionary structure. Thus, Applicant submits that Preston fails to teach or suggest retrieving a data dictionary that includes metadata terms and definitions and determining lexical nodes of the data dictionary based on the terms, wherein each node is associated with a metadata term and the term's definition.

Therefore, Applicant submits that independent Claims 1 and 15 are allowable over the cited reference.

REJECTION OF CLAIMS 2, 3, 16, and 17 UNDER 35 U.S.C. § 103

The Office Action rejected Claims 2, 3, 16, and 17 as being unpatentable over Preston in view of Fayyad.

Referring to Claims 2 and 16, Applicant submits that in addition to the arguments noted above, Claims 2 and 16 are allowable for the following additional reason. Applicant submits that Preston or Fayyad, alone or in combination, fail to teach or suggest that the determined dependencies are selected from a list consisting of noncaution, or noncyclical-type dependencies, caution-type dependencies, or cyclical-type dependencies. Therefore, Applicant submits that Claims 2 and 16 are allowable for these additional reasons.

Because Claims 3 and 17 depend from allowable independent claims, they are allowable for the same reasons that make their corresponding independent claims allowable.

REJECTION OF CLAIMS 4-7 AND 18-21 UNDER 35 U.S.C. § 103

The Office Action rejected Claims 4-7 and 18-21 as being unpatentable over Preston in view of Can et al. (hereinafter Can) The Office Action states that Preston discloses all the claims' subject matter as set forth above, but fails to disclose determining a lexical stability value for each node. Applicant respectfully traverses this rejection.

Applicant submits that stability analysis performed by Can refers to stability analysis of the CC-based maintenance algorithm. Also, Can fails to overcome the deficiencies of Preston as noted above. Therefore, Applicant submits that because Claims 4-7 and 18-21 depend from allowable independent claims, they are allowable for the same reasons that make their corresponding independent claims allowable.

REJECTION OF CLAIMS 8-12 AND 22-26 UNDER 35 U.S.C. § 103

The Office Action rejected Claims 8-12 and 22-26 as being unpatentable over Preston in view of Can and further in view of Fayyad et al. (hereinafter Fayyad) The Office Action states that neither Preston nor Can disclose displaying an aggregate stability value and that Fayyad does display an aggregate stability value. Applicant respectfully traverses this rejection.

Fayyad discloses a weighting factor proportional to H2 (probability density value) (col. 6, lines 20-23). Applicant submits that Fayyad fails to teach or suggest displaying and determination of an aggregate stability value. The aggregate stability value is described in the specification on page 9. The aggregate stability value is not a weighting value, but is a measure of the transitive closure of lexical dependency relations within a subgraph. This provides some useful information for a user of the system.
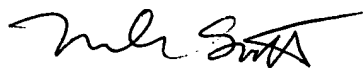
Therefore, because Claims 8-12 and 22-26 depend from allowable independent claims, they are allowable for the reasons noted above and for the same reasons their corresponding independent claims are allowable.

CONCLUSION

Applicant respectfully submits that all of the claims of the pending application are now in condition for allowance over the cited references. Accordingly, Applicant respectfully requests withdrawal of the rejections, allowance, and early passage through issuance. If the examiner has any questions, the examiner is invited to contact the Applicant's agent listed below.

Respectfully submitted,

BLACK LOWE & GRAHAM^{PLLC}

Michael S. Smith
Registration No. 39,563
Direct Dial: 206.749.9888

MAIL CERTIFICATE

I hereby certify that this communication is being deposited with the United States Postal Service via first class mail under 37 C.F.R. § 1.08 on the date indicated below addressed to: MAIL STOP AF, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450.

5/3/05
Date of Deposit

Michelle J. Carman

BLACK LOWE & GRAHAM ^{PLLC}

701 Fifth Avenue, Suite 4800
Seattle, Washington 98104
206.381.3300 • F: 206.381.3301